

REMARKS

This is in response to the Office Action dated March 13, 2006. Claim 3 has been canceled. Claims 1-2 and 4-16 are now pending. However, claims 8-14 are currently withdrawn.

The subject matter of claim 3 has been added to all independent claims (i.e., claims 1, 7, 15 and 16).

These claims, namely claims 1, 7, 15 and 16, which include the subject matter of previous claim 3 define over the cited art (Beddingfield and Papathomas) for at least the following reasons. Claims 1, 7, 15 and 16 require that the *insulating substrate is an insulating tape that is bendable*.

In certain embodiments of this invention, the claimed solder resist and fillet are provided on an insulating tape substrate that is bendable in order to improve strength and reliability of resin sealing and to reduce fabrication problems caused by so-called "rise" of the insulating resin. In contrast with the inventions of claims 1, 7, 15 and 16, Beddingfield (considering it in terms of its objects and technical features) is premised on the fact that its insulating substrate is a non-tape *plate*. The rejecting previous claim 3, the Examiner implicitly admitted that Beddingfield fails to disclose or suggest a bendable insulating tape in this regard.

Recognizing this flaw in Beddingfield, the Office Action cites to Papathomas for a bendable insulating tape. However, this Section 103(a) rejection is fundamentally flawed because in Beddingfield's semiconductor device which is premised on a plate member as an insulating substrate with a certain thickness, it is impossible to replace the plate of Beddingfield with a bendable insulating tape. Namely, one of ordinary skill in the art would never have applied the "insulating tape" of Papathomas as the insulating substrate in Beddingfield because

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this would prevent Beddingfield's device from functioning and applying as desired.

Furthermore, there is no motivation or suggestion for this alleged modification in the cited art.

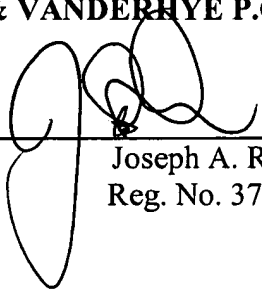
For at least the aforesaid reasons, it is respectfully submitted that the Section 103(a) rejections of claims 1, 7, 15 and 16 should be withdrawn.

All claims are in condition for allowance. If any minor matter remains to be resolved, the Examiner is invited to telephone the undersigned with regard to the same.

Respectfully submitted,

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